

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

THANH THACH,

Plaintiff,

v.

Case No.: 3:14-cv-00070-HEH

EQUIFAX INFORMATION SERVICES LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., BRYANT STATE BANK, CREDIT ONE
BANK, COMENITY BANK, FIRST PREMIER
BANK, and LVNV FUNDING,

Defendants.

**DECLARATION OF IAN SMITH IN SUPPORT OF
EQUIFAX INFORMATION SERVICES LLC'S RESPONSE IN
OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL, OR, IN THE
ALTERNATIVE, PLAINTIFF'S MOTION IN LIMINE**

I, Ian Smith, hereby declare as follows:

1. I am over the age of 21, and have personal knowledge of the facts set forth herein, and those facts are true and correct.
2. I am an attorney with the law firm of King and Spalding LLP in Atlanta, Georgia, representing Equifax Information Services LLC ("Equifax") in the above-captioned action.
3. As one of the attorneys of record for Equifax in this case, my responsibilities include, *inter alia*, drafting and providing responses to Plaintiff's discovery requests and corresponding with Plaintiff's counsel regarding the same.
4. On November 21, 2013, I sent an e-mail to Pamela Smith, a Legal Support Associate of Equifax and requested that she review the consumer files of the Plaintiff and another consumer based on a high likelihood that lawsuits would be brought by these consumers

against Equifax.

5. In January 31, 2014, Plaintiff filed her complaint against Equifax and several other defendants.

6. In June 2014, both parties exchanged discovery requests and responded to same.

7. On July 25, 2014, Equifax served its responses to Plaintiff's discovery requests, relying in part on its earlier served objections.

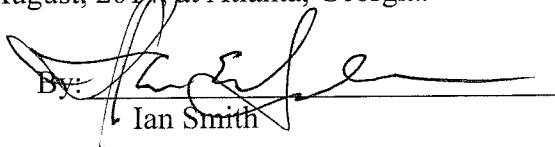
8. After Plaintiff's receipt of Equifax's responses, counsel for Plaintiff and Equifax conferred on Equifax's responses.

9. At various times thereafter, Equifax supplemented its discovery requests with additional documents, including its contract with its vendor, Intelenet Global Services Private Ltd. (now known as Serco). In providing the agreement, Equifax redacted, as not relevant to the current litigation, the pricing and financial information contained within the agreement.

10. On August 20, Equifax supplemented its discovery requests with the name of the individuals named in the reinvestigation records in the cases.

Pursuant to 28 U.S.C. §1746 and the laws of the United States of America, I further declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of August, 2014, at Atlanta, Georgia.

By: 
Ian Smith